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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAURA MORENO,

Plaintiff,

vs.

GEONNIE ALLUMS, individually; C.R.  
ENGLAND, INC.; ENGLAND LOGISTICS, INC;  
and DOES 1 to 100, ROE CORPORATIONS 1 to  
100, inclusive

Defendants.

Case No.: 2:19-cv-372 -JMC-DJA

**Stipulation and Order to Extend  
Discovery (7<sup>th</sup> Request)**

**I.**

**DISCOVERY COMPLETED TO DATE**

1. A 26(f) Conference was held and a Discovery Plan and Scheduling Order was filed.
2. Plaintiff have served 4 disclosures per Rule 26(a)(1) listing witnesses and providing documents.
3. Defendants have served 7 disclosures per Rule 26(a)(1) listing witnesses and providing documents.
4. Plaintiff served interrogatories, requests for production, and requests for admission to Geonnie Allums, but he has not responded.
5. Plaintiff served interrogatories, requests for production, and requests for admission to C.R. England, Inc. to which C.R. England responded.
6. Both parties have served various subpoenas for documents. For example, Defendants subpoenaed Nevada Highway Patrol for accident records and Trans Vegas Express for

1 Plaintiff's employment records.

2 7. Plaintiff has been deposed.

3 8. Defendant Geonnie Allums' deposition was noticed and proceeded, but he did not  
4 appear.

5 9. Defendants have deposed Plaintiffs' expert witnesses Roger Allen and David Oliveri.

6 10. All parties have disclosed initial experts and rebuttal experts.

7 11. Defendants have disclosed its rebuttal experts and their reports.

8 II

9 **DISCOVERY TO BE COMPLETED**

10 1. Plaintiff's expert Michael Freeman on February 1.

11 2. Plaintiff's expert Kelly Deecher on either February 1 or 18.

12 3. Plaintiff's expert Leonard Matheson on February 18.

13 4. Plaintiff's treating physicians.

14 III.

15 **WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE**  
16 **SCHEDULING ORDER**

17 The prior extensions have been due to both COVID-19 restrictions and the parties' prior,  
18 unsuccessful private mediation. At this point, the parties believe the remaining discovery is all  
19 that is left to complete. This short extension was necessary to accommodate the witness and  
20 parties' deposition availability. Moreover, the parties have recommenced settlement  
21 negotiations, but require more time. Therefore, the extension will help to facilitate the parties'  
22 settlement efforts.

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## IV.

**PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

DISCOVERY	PROPOSED DEADLINE
Motion to Amend Pleadings:	Completed
Initial Expert Disclosures	Completed
Rebuttal Expert Disclosures:	Completed
Interim Status Report	Completed
Close of Discovery	March 29, 2021
Dispositive Motions:	April 23, 2021
Joint Pre-Trial Order:	May 25, 2021

DATED this 22<sup>nd</sup> day of January, 2021.

**NAQVI INJURY LAW**

BY: /s/ Elizabeth E. Coats  
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 England, Inc.

**IT IS SO ORDERED**

Dated this 25<sup>th</sup> day of January, 2021

DANIEL J. ALBREGTS  
 UNITED STATES MAGISTRATE JUDGE